



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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MAR 07 2011

Ref: EPR-N

Cathy Kropp
Public Affairs Office
U.S. Army Environmental Command
1835 Army Blvd. BSMT (Bldg. 200)
Fort Sam Houston, TX 78234-2686

Re: Final Programmatic Environmental Impact
Statement for the Realignment, Growth, and
Stationing of Army Aviation Assets, CEQ #
20110031

Dear Ms. Kropp:

The U.S. Environmental Protection Agency (EPA) Regions 8 and 10 have reviewed the Army's Final Programmatic Environmental Impact Statement (PEIS) for the Realignment, Growth, and Stationing of Army Aviation Assets at Fort Carson, Colorado and Joint Base Lewis-McChord (JBLM), Washington. We provide our comments in accordance with our review responsibility under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. 7609.

The Army's preferred alternative is to place a combat air brigade (CAB) at both Fort Carson and JBLM through the creation of a new CAB and realignment of existing forces to create another CAB. The Fort Carson CAB will conduct training activities at the Pinon Canyon Maneuver Site (PCMS) and the JBLM CAB will use the Yakima Training Center (YTC). A CAB consists of approximately 120 helicopters, 600 wheeled vehicles, and 2,700 soldiers. We provided comment on the Draft PEIS for this project on December 15, 2010.

We appreciate the Army's inclusion of information disclosing surface water impairments within the affected area, additional estimations of greenhouse gas (GHG) contributions from the project, links to documents referenced such as the *Grow the Army* (GTA) EIS from which many mitigation measures identified in this PEIS were derived, and a summary of mitigation. In addition to "existing" mitigation, a number of "additional" measures to offset the impacts of this project were described in Sections 4.2, 4.5, and Table 11. These measures include the construction of a new wastewater treatment plant at JBLM; monitoring stations on JBLM to collect localized air quality sampling data; the use of ultra low sulfur diesel to reduce SO_x emissions and low-impact development practices at Fort Carson; and, the development of a stormwater

management plan and a Watershed Assessment of River Stability and Sediment Study at PCMS. We also recommend clarification of whether mitigation described as “existing” or “additional” are “existing” and “additional” to this PEIS or the GTA EIS and whether these measures have already been incorporated into a Record of Decision (ROD).

A ROD will be issued no earlier than 30 days from the publication of the Notice of Availability for the Final PEIS. The Army has identified a number of mitigation measures to offset the impacts of the preferred alternative. We recommend the Army capture these measures, especially those that are not currently captured in the ROD for the GTA EIS, in the ROD for this PEIS. Some of the mitigation measures described within the Final PEIS include or consist of monitoring, but some do not. We recommend inclusion of a monitoring plan within the ROD to assess the implementation and effectiveness of mitigation and the accuracy of predicted impacts.

In our December 15, 2010 comments on the Draft PEIS, EPA commented on potential air quality impacts associated with transportation activities at JBLM. In examining the proposed mitigation measures, we recommended that the Final PEIS look beyond traffic flow improvements at JBLM to measures such as car pool, van pool, or public transit programs. The Final PEIS includes an “existing” mitigation measure for Fort Carson to pursue alternative transportation methods and encourage transit ridership and carpooling to reduce vehicle travel miles (Final PEIS Table 11). We encourage the Army to pursue a parallel effort at JBLM and to include it in the ROD. This would be consistent with the recommendations throughout Appendix E (JBLM Travel Analysis) and would complement the proposed measures to improve traffic flow (Final PEIS Section 4.5.3). As noted in section 6.12.2, a CAB placement at JBLM would significantly affect traffic on and around JBLM and contribute to deterioration in level of service. It is not clear from the Final PEIS how or to what extent the proposed flow improvement projects would mitigate for these projected impacts.

We also remain concerned about potential air quality impacts associated with a 12% increase in traffic volume at the JBLM gates. We appreciate the commitment to collect localized air quality sampling data but continue to believe that the addition of mitigation geared at reducing (as opposed to rerouting) traffic would help to ensure that National Ambient Air Quality Standards will be met in the long term. To reduce emissions from its own fleet, we also encourage the Army to replace non-tactical vehicles, where practicable, with plug in electric vehicles (PEV). Many cities along the I-5 corridor are investing in PEV charging infrastructure as part of the “EV Project” funded by the Department of Energy. Utilizing non-tactical PEV on JBLM would complement these efforts and help the Army meet the goals of the Memorandum of Understanding between the Department of Energy and the Department of Defense concerning cooperation on a strategic partnership to enhance energy security.

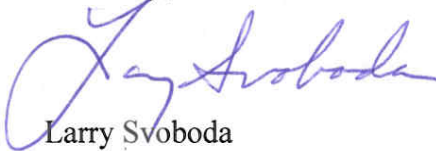
The Final PEIS provides additional information regarding the preferred alternative’s greenhouse gas (GHG) emissions on an annual basis. Estimations of contributions from ground training exercises and transportation impacts were added to the Draft PEIS estimation for aviation training. Based upon this new information, the total estimate for the project is 87,809 tons carbon dioxide equivalents (CO₂-eq) per year at Fort Carson and PCMS; and, 87,989 tons

CO₂-eq per year at JBLM and YTC, neither estimate including residential energy use. While annual estimates are important, we also encourage estimation of GHG emissions over the lifetime of the project. The Final PEIS concludes that these levels of GHG emissions are not a significant increase but recognizes the potential for these levels to cumulatively contribute to climate change (Final PEIS Sections 5.5.2 and 6.5.2). We note that, as discussed in the 2010 CEQ Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions (Draft Guidance), the estimated level of GHG emissions from the project and its alternatives serves as a reasonable proxy for assessing potential climate change impacts. Moreover, the Draft Guidance identifies 25,000 metric tons CO₂-eq per year as a threshold at, or beyond, which a more robust, qualitative and quantitative analysis of project impacts is warranted. The Final PEIS includes "existing" mitigation measures at Fort Carson to offset emissions and support the Army's sustainable energy goal to achieve 100% of its energy needs from renewable sources by 2027. It would also be helpful to describe how this proposed project and GHG mitigation measures would support the Greenhouse Gas Reduction Goals in the Department of Defense's 2010 Strategic Sustainability Performance Plan¹, and the overall Department of Defense goal to reduce GHG emissions from non-combat activities by 34% from FY 2008-2020 pursuant to Executive Order 13514. We encourage the Army to identify any appropriate project mitigation measures that would support this goal and to incorporate reasonable GHG mitigation measures into the ROD.

The Final PEIS does not provide much additional detail on the methods or information used for impact determination nor does it address potential impacts of noise to wildlife. We continue to encourage the Army to provide greater disclosure of these elements to further support its rationale, enable evaluation of the information being used, facilitate development of quantifiable baselines, and aid any reevaluation of impacts that may become necessary in the future.

We appreciate the opportunity to review and comment on this Final PEIS. If we may provide further explanation of our comments, please contact me at 303-312-6004, Maggie Pierce of my staff at 303-312-6550, or Teresa Kubo of Region 10 at 503-326-2859.

Sincerely,



Larry Svoboda

Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

cc: Teresa Kubo, EPA Region 10

¹ http://www.acq.osd.mil/ie/download/green_energy/dod_sustainability/DoD%20SSPP-PUBLIC-26Aug10.pdf